

June 14, 2001

APPLICANT: Southern Nuclear Operating Company, INC.

SUBJECT: SUMMARY OF WORKING MEETING WITH SOUTHERN NUCLEAR
OPERATING CO., INC., (SNC) REGARDING TREATMENT OF CATEGORY 2
PIPING FOR LICENSE RENEWAL

On May 24, 2001, representatives of Southern Nuclear Operating Co., Inc. (SNC) and Bechtel, met with the Nuclear Regulatory Commission (NRC) staff to clarify the current licensing basis (CLB) with regard to Category 2 piping.

The meeting was a followup to a meeting held on March 29, 2001, regarding several open items associated with the staff's review of the Plant Hatch license renewal application. The purpose of this followup meeting was to clarify how Category 2 piping (including Seismic II/I piping) is designed to prevent its failure from adversely affecting safety-related functions, as required by 10 CFR 54.4(a)(2). This issue was identified as Open Item 2.1.3.1-1 in the staff license renewal SER for Plant Hatch.

SNC and Bechtel provided information to the staff regarding how Category 2, high-, moderate-, and low-energy piping outside primary containment is treated in the CLB and design bases, how the effects of postulated failures of this piping are considered, and why the safety-related function of structures, systems, and components will not be adversely affected due to credible postulated failures of Category 2 (including seismic Category II/I) piping. The staff found that much of the information provided by SNC and Bechtel is not well-documented in the LRA, FSAR, or supporting documentation. As a result, the staff asked SNC to respond to the open item with a comprehensive and detailed explanation of the treatment of Category 2 piping.

In addition, SNC and the staff discussed SNC's belief that inclusion of Seismic II/I piping segments within the scope of license renewal is inappropriate. Specifically, for piping segments that could fall during a seismic event and damage safety-related SSCs, SNC seismically supports these piping segments and believes that it would require the pipe to break in two places between the seismic supports before it would fall and potentially impact safety-related equipment. SNC believes that the pipe breaking in two places between seismic supports is not a credible postulated failure, and that seismically supported piping falling on safety-related SSCs is a hypothetical failure event outside of the CLB and design bases, and therefore the associated seismic II/I piping need not be included within scope. The staff disagrees with SNC's approach. The staff believes that all piping whose failure could adversely impact safety-related functions should be included within the scope of license renewal. The staff's position is consistent with the guidance provided in the Statement of Consideration (SOC) for the license renewal rule. The SOC states that "The inclusion of non-safety-related systems, structures, and components whose failure could prevent other systems, structures, and components from accomplishing a safety function is intended to provide protection against safety function failure in cases where the safety-related structure or component is not itself impaired by age-related degradation but is vulnerable to failure from the failure of another structure or component that may be so impaired..."

June 14, 2001

The staff requested that, in addition to clarifying the nature of the plant design features which protect safety-related SSCs from piping failures, the applicant decide whether they will (1) include Category 2 piping in the scope of the renewal review (either as a commodity or as specific segments whose failure could prevent satisfactory accomplishment of any of the functions identified in §54.4(a)(1) of the rule) and identify appropriate aging management practices or (2) appeal the scoping issue to more clearly present the applicant's basis for concluding that the failure of the piping is unnecessarily "hypothetical." Chris Grimes noted that the SNC decision must be concluded so that they can complete their response to the open items by June 8, 2001, to maintain the renewal review schedule.

The attachment is the attendees list.

/RA/

William F. Burton, Senior Project Manager
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Attachment: As stated

cc w/att: See next page

The staff requested that, in addition to clarifying the nature of the plant design features which protect safety-related SSCs from piping failures, the applicant decide whether they will (1) include Category 2 piping in the scope of the renewal review (either as a commodity or as specific segments whose failure could prevent satisfactory accomplishment of any of the functions identified in §54.4(a)(1) of the rule) and identify appropriate aging management practices or (2) appeal the scoping issue to more clearly present the applicant's basis for concluding that the failure of the piping is unnecessarily "hypothetical." Chris Grimes noted that the SNC decision must be concluded so that they can complete their response to the open items by June 8, 2001, to maintain the renewal review schedule.

The attachment is the attendees list.

/RA/

William F. Burton, Senior Project Manager
 License Renewal and Standardization Branch
 Division of Regulatory Improvement Programs
 Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Attachment: As stated

cc w/att: See next page

DISTRIBUTION:

See next page

ADAMS ACCESSION NUMBER: ML011660023

*See previous concurrence

Publicly Available Non-Publicly Available Sensitive Non-Sensitive

DOCUMENT NAME: G:\RTSB\BURTON\05_24_01MTGSUM.WPD

OFFICE	LA:DRIP	SPM:RTSB:DRIP	BC:EMEB:DE	BC:RTSB:DRIP
NAME	EGHylton*	WFBurton	EVImbro	CIGrimes
DATE	06/12/2001	06/13/2001	06/13/2001	06/14/2001

OFFICIAL RECORD COPY

EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
WORKING MEETING ON SCOPING
ATTENDANCE LIST
APRIL 12, 2000

<u>NAME</u>	<u>ORGANIZATION</u>
WILLIAM BURTON	NRC/NRR/DRIP/RLSB
CHANG LI	NRC/NRR/DSSA/SPLB
YUEH LI	NRC/NRR/DE/EMEB
GENE IMBRO	NRC/NRR/DE/EMEB
GREG GALLETTI	NRC/NRR/DIPM/IQPB
RAJ ANAND	NRC/NRR/DRIP/RLSB
CHRIS GRIMES	NRC/NRR/DRIP/RLSB
MICHAEL BUGG	NRC/NRR/DIPM/IQMB
KAMAL MANOLY	NRC/NRR/DDE/EMEB
STEVE KOENICK	NRC/NRR/DRIP/RLSB
RAY BAKER	SOUTHERN NUCLEAR CO.
CHARLES PIERCE	SOUTHERN NUCLEAR CO.
WILLIAM EVANS	SOUTHERN NUCLEAR CO.
JITU RATHOD	BECHTEL
DOUG DISMUKES	BECHTEL
JESSE LOVE	BECHTEL
ANESTIS PAPADOPOULOS	BECHTEL
DEANN RALEIGH	SCIENTECH
JERRY PHILLABAUM	EXELON

DISTRIBUTION:

HARD COPY

RLSB RF

E. Hylton

E-MAIL:

PUBLIC

J. Johnson

W. Borchardt

D. Matthews

C. Carpenter

C. Grimes

W. Beckner

B. Zalcmán

J. Strosnider

G. Bagchi

K. Manoly

W. Bateman

J. Calvo

S. Rosenberg

G. Holahan

T. Collins

B. Boger

G. Galletti

B. Thomas

J. Moore

R. Weisman

M. Mayfield

S. Bahadur

A. Murphy

W. McDowell

S. Droggitis

S. Duraiswami

RLSB Staff

D. Hoefling

L. Olshan

J. Vora

H. Berkow

S. Cahill

J. Wilson

C. Casto

C. Julian

E. Imbro

Southern Nuclear Operating Company
Edwin I. Hatch Nuclear Plant Units 1 and 2

Docket Nos.: 50-321, 50-366

cc:

Mr. D. M. Crowe
Manager, Licensing
Southern Nuclear Operating Company Inc.
P.O. Box 1295
Birmingham, Alabama 35201-1295

Ms. Rita Kilpatrick
Georgians for Clean Energy
427 Moreland Ave., Ste 100
Atlanta, Georgia 30307

Resident Inspector
Plant Hatch
11030 Hatch Parkway N
Baxley, Georgia 31531

Chairman
Appling County Commissioners
County Courthouse
Baxley, Georgia 31531

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, Georgia 30303

Mr. J. D. Woodard
Executive Vice President
Southern Nuclear Operating Company, Inc.
P. O. Box 1295
Birmingham, Alabama 35201-1295

Mr. Charles H. Badger
Office of Planning and Budget
Room 610
270 Washington Street, SW
Atlanta, Georgia 30334

Mr. P. W. Wells
General Manager, Edwin I. Hatch Nuclear
Plant
Southern Nuclear Operating Company, Inc.
U.S. Highway 1 North - P.O. Box 2010
Baxley, Georgia 31515

Mr. Harold Reheis, Director
Department of Natural Resources
205 Butler Street, SE, Suite 1252
Atlanta, Georgia 30334

Mr. R. D. Barker
Program Manager
Fossil & Nuclear Operations
Oglethorpe Power Corporation
2100 East Exchange Place
P.O. Box 1349
Tucker, Georgia 30085-1349

Mr. Steven M. Jackson
Senior Engineer-Power Supply
Municipal Electric Authority of Georgia
1470 Riveredge Parkway, NE
Atlanta, Georgia 30328-4684

Charles A. Patrizia, Esq.
Paul, Hastings, Janofsky & Walker
10th Floor
1299 Pennsylvania Ave
Washington, DC 20004-9500

Mr. Douglas J. Walters
Nuclear Energy Institute
1776 I Street, NW
Washington, DC 20006

Mr. Ray Baker
Manager, License Renewal Services
Southern Nuclear Operating Company, Inc.
P.O. Box 1295
Birmingham, Alabama 35201-1295

Mr. Stan Blanton
Balch and Bingham
P.O. Box 306
Birmingham, Alabama 35201

Mr. David Lochbaum
Union of Concerned Scientists
1707 H Street, NW
Suite 600
Washington, DC 20006-3919

Mr. C.R. Pierce
Southern Nuclear Operating Company
40 Inverness Center Parkway
P.O. Box 1295
Birmingham, Alabama 35201-1295

Mr. Alice Coleman
Appling County Library
242 East Parker St.
Baxley, Georgia 31513

Mary Jane Wilmoth, Esq.
National Whistleblower Legal Defense
and Education Fund
3238 P Street, NW
Washington, DC 20007-2756

Mr. Jeffrey Stair
Georgia Public Service Commission
47 Trinity Avenue
Atlanta, Georgia 30334

The Honorable Cynthia A. McKinney
Attn: Mr. Eric Lausten, Constituent Services
Representative
246 Sycamore St., Suite 110
Decatur, Georgia 30030

Ms. Dusty Gres
Ochoopee Regional Library System
610 Jackson St.
Vidalia, Georgia 30474